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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case: 4:21-cr-20362
Judge: Leitman, Matthew F.
MJ: Ivy, Curtis
Filed: 06-02-2021
SEALED MATTER (tt)

D-1 KEIYON LERAY WILLIAMS,
D-2 DARIAN LAMAR McQUEEN,
D-3 TYQUICE DAIQUAN JACKSON,
D-4 CHRISTIAN AMEER GILLARM,
D-5 DEANDRE CARTESE MORGAN,
D-6 TAJUAN TERANTE TATE,
D-7 TYREE RANDLE,
D-8 DEMETRIC MAQUISE HALL,
D-9 CORVIEONTA DIERUS-GEORGE DOSS,
D-10 ECOUVILLION GARTH,
D-11 MYRIEL LEWIS EDGAR, and
D-12 JOSEPH VERNON WILBANKS,

FILED
JUN 02 2021
U.S. DISTRICT COURT
FLINT, MICHIGAN

Defendants.

INDICTMENT

THE GRAND JURY CHARGES

COUNT ONE

18 U.S.C. §§ 1349 & 1343; Wire Fraud Conspiracy

Object of the Conspiracy

1. Beginning about December 2017, and continuing until the date of this indictment, in the Eastern District of Michigan and elsewhere, KEIYON LERAY

WILLIAMS, DARIAN LAMAR McQUEEN, TYQUICE DAIQUAN JACKSON, CHRISTIAN AMEER GILLARM, DEANDRE CARTESE MORGAN, TAJUAN TERANTE TATE, TYREE RANDLE, DEMETRIC MAQUISE HALL, CORVIEONTA DIERUS-GEORGE DOSS, ECOUVILLION GARTH, MYRIEL LEWIS EDGAR, JOSEPH VERNON WILBANKS and others known and unknown to the grand jury, knowingly conspired and agreed with each other and other persons to devise and execute a scheme and artifice to defraud and to obtain money by means of materially false and fraudulent pretenses, representations and promises; and, for purposes of executing the scheme, caused the interstate transmission of writings, signs, signals, and sounds.

Manner and Means

2. The manner and means by which the conspiracy was carried out included, among other things, that members of the conspiracy would travel to Target stores in the Eastern District of Michigan and elsewhere for the purpose of fraudulently obtaining prepaid credit and/or gift cards. To execute the fraudulent scheme, conspirators present a prepaid credit/gift card to a cashier for purchase. The cashier would scan the barcode on the prepaid card to identify the product information. The cashier next would scan the barcode located under the security tab which then transmits, via a wire transmission, the product information to one of Target's main server located in the Elk River and Brooklyn Park, Minnesota. The

information is then formatted and routed, via a wire transmission, to InComm data centers located in Plano and Dallas, Texas. Incomm then routes the pre-authorization request, via a wire transmission, to the appropriate authorizer of the prepaid card. Notification of pre-authorization is then sent via a wire transmission from the authorizer to Incomm, and then to Target's main servers and back to the local store register. Once pre-authorized the cashier can accept payment for the prepaid card.

3. When asked for payment, a member of the conspiracy would advise the cashier that he/she is paying with a "cash card" and/or would slide, or simulate sliding, a card through the card reader and/or point of sales device, fraudulently purporting to make a payment for the transaction. A member of the conspiracy would then instruct the cashier that in order to complete the transaction, the cashier would need to press the K1 cash tender key on the register.

4. When the key sequence is completed fraudulently representing at the point of sale/register that the transaction has been paid, payment notification is sent to the authorizer, via a wire transmission from the local store register to Target's main servers, and then to Incomm. Approval and credit/gift card activation is then sent via a wire transmission from the authorizer to Incomm, and then to Target's main servers and the local store register. The wire transmission of the credit/gift card activation causes the register cash drawer to open and a receipt to be printed

fraudulently suggesting payment for the credit/gift card has been made by the conspirator. The funds are now available on the credit/gift card, which is given to the conspirator.

5. After the fraudulent transaction is completed, a member or members of the conspiracy would convert the funds on the prepaid cards to their own personal use, conduct the scheme again with additional prepaid credit/gift cards, and inform other members of the conspiracy of their success so that other conspirators could conduct similar fraudulent transactions at that respective location.

6. All in violation of Title 18, United States Code, Sections 1349 & 1343.

THIS IS A TRUE BILL.

Dated: June 2, 2021

s/Foreperson

SAIMA S. MOHSIN
Acting United States Attorney

s/NANCY A. ABRAHAM
Assistant United States Attorney
600 Church Street
Flint, MI 48502
(810) 766-5177

s/ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices

Companion Case information MUST be completed by AUS,United States District Court
Eastern District of Michigan**Criminal Case Cove**Case: 4:21-cr-20362
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complet

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: NAA

Case Title: USA v. KEIYON LERAY WILLIAMS, et alCounty where offense occurred: Genesee County and elsewhereCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

FILED
JUN 02 2021
 U.S. DISTRICT COURT
 FLINT, MICHIGAN

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

Date: June 2, 2021

s/Nancy A. Abraham
 Assistant United States Attorney
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 Flint, MI 48502
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 Attorney Bar #: P-42060

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.